

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff,

vs.

JASON GOODMAN, et al.,

Defendant

Case No.: 3:17-cv-00601-MHL

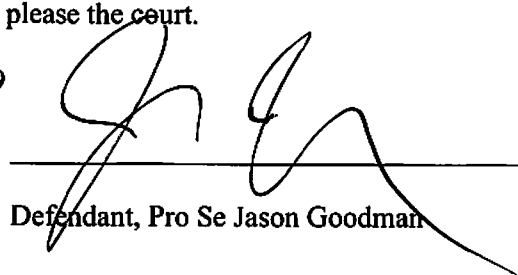
DEFENDANT'S MOTION FOR
PROTECTIVE ORDER AND MOTION TO
STAY DISCOVERY

**DEFENDANT'S MOTION FOR PROTECTIVE ORDER AND MOTION TO STAY
DISCOVERY**

Comes now, Defendant Jason Goodman, Pro Se, pursuant to Rule 26(c)(1)(A) of the Federal Rules of Civil Procedure, to move the Court for a Protective Order and to Stay Discovery to protect Defendant from annoyance, embarrassment, oppression, and undue burden and expense.

I hereby attest that the pleadings herein are accurate and true under penalties of perjury. Further, I hereby attest that the attached exhibits are accurate and true copies of source documents as described. Video and telephone recording transcripts may contain typos due to voice to text transcription software. True and accurate copies of original video and audio recordings can be provided should it please the court.

Signed this 6 day of May 2019


Defendant, Pro Se Jason Goodman

DEFENDANT'S MOTION FOR PROTECTIVE ORDER AND MOTION TO STAY DISCOVERY - 1

I. INTRODUCTION

Plaintiff has failed to make a legitimate claim for which relief can be granted. Defendant has alleged a conspiracy between Plaintiff, Intervenor Applicant, co-Defendant Queen Tut aka Susan Lutzke aka Susan Holmes (herein after HOLMES) and non-party co-conspirators. Ample evidence exists in the public domain to determine conclusively that Plaintiff's claims set forth in the Amended Complaint are based on false and materially misleading statements, have no basis in fact or law, are unsupported by evidence and cannot survive on their merits. Defendant did NOT knowingly or willfully ignore the truth with the intent to damage Plaintiff. Defendant did NOT act out of malice. Plaintiff is a public figure and well-known author and social media personality. Defendant believes all statements made with regard to Plaintiff to be true and correct. It is additionally Defendant's belief that Counsel for Plaintiff, Steven S. Biss (herein after BISS) deliberately deceived Defendant in an effort to hold a 26 f Discovery conference without the Defendant present, which did in fact take place on May 3, 2019.

II. BACKGROUND

Plaintiff has failed to explain why he did not present Defendant with a cease and desist order and demand for retraction prior to bringing this civil suit. If Plaintiff is in possession of evidence that proves Defendant's claims are factually inaccurate, Plaintiff had a reasonable obligation to attempt to resolve this dispute directly, prior to involving the court. It is Defendant's belief that Plaintiff's complete failure to attempt this is evidence of Plaintiff's intent to harass, embarrass, intimidate and subject Defendant to undue burden and expense with this vexatious legal action.

III. ARGUMENTS AND AUTHORITIES

Defendant is entitled to an order protecting him from responding to Plaintiffs' discovery requests. According to Rule 26 (c) of the Federal Rules of Civil Procedure, the court may grant an order to deny, limit or restrict discovery to "*Protect a participant or other person from undue annoyance, burden, harassment or oppression;*"

In the interest of Proportional Discovery and in accordance with Rule 26 (B)(1) "*the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit*" discovery in this matter would create additional undue burden and expense for the Defendant which would outweigh any benefit. Ample public information is available with regard to all claims made by Plaintiff and discovery of personal information would not have proportional importance to the resolution of Plaintiff's claims. It is Defendant's belief that creating a burden and causing expense are in fact the intended purposes of Plaintiff's action and Plaintiff is NOT acting in good faith. All facts and information required to resolve this matter are available in the public domain and no amount of discovery would offer a proportional benefit toward resolution.

Defendant further objects to Plaintiff's Written Report and Discovery plan because Biss deliberately engaged in deceptive measures and improperly scheduled the 26 f Discovery conference. Despite the clerk's entry of a default judgement against co-Defendant Holmes on September 6, 2018, Biss waited more than six months to make an initial request for 26 f conference April 16, 2019. **(EXHIBIT A)**

Defendant stated he would be unavailable until the start of May 2019 and Biss followed up with all relevant parties on April 19, 2019 with regard to possible conference dates.

(EXHIBIT B)

1 Defendant received NO response from ANY participants although each had Goodman's
2 proper email address. On May 2, due to lack of response, Defendant Goodman contacted Biss
3 once again to inquire about a new time to schedule the conference. **(EXHIBIT C)**

4
5 During the May 2 email exchange, Biss revealed that he had sent a confirmation email to
6 jasongoodman72@protonmail.com. This is NOT an email address provided to Biss by
7 Defendant. This is NOT the email address of record for the Defendant. This is NOT an email
8 address that Defendant has ever sent mail to Biss from. This is NOT a currently active email
9 address and Defendant does NOT have access to it. In fact, Biss states that the email address in
10 question was provided by Holmes. **(EXHIBIT D)**

11
12 Upon learning of the cause of the communication breakdown and revealing the evidence
13 which indicated Defendant had not seen the message, Biss MADE NO EFFORT
14 WHATSOEVER to reschedule the conference call. Biss instead falsely stated that Defendant
15 had claimed to be available May 3. Biss falsely stated Defendant had been properly notified.
16 Biss called Defendant on May 3, 2019 during a time Defendant had clearly stated he was not
17 available to speak. Defendant was not able to participate in the 26 f conference. Biss chose to
18 move forward with a conference attended only by Benjamin Wills, co-Counsel for co-Defendant
19 Negron. Prior to May 6, 2019 as far as Defendant Goodman had been aware, Wills had not been
20 party to emails regarding this legal matter since May of 2018.

21
22
23 On May 6, 2019, Defendant corresponded with Wills. Wills provided email confirmation
24 that Biss had sent an email to the wrong address, asking Defendant if May 2 or 3 were acceptable
25 and what telephone number to contact Defendant on. There was no response to this inquiry
26 because Defendant DID NOT RECEIVE THE EMAIL, however Biss failed to follow up.
27 **(EXHIBIT E)**

28
DEFENDANT'S MOTION FOR PROTECTIVE ORDER AND MOTION TO STAY DISCOVERY - 4

1 It has further come to Defendant's attention that Plaintiff has sought financial settlement
2 with co-Defendant Negron, negotiating privately with counsel for co-Defendant. This furthers
3 Defendant Goodman's belief that this entire legal action is a "for profit" venture, undertaken by
4 Plaintiff with the specific intent to harass, intimidate and coerce Defendants into financial
5 settlements or otherwise face the costly and mounting burden of retaining legal counsel.
6

7 Biss was aware there was no confirming response from Defendant to his email requesting
8 the 26 f conference but made no additional efforts between April 19 and May 2 to confirm the
9 date. Biss was also aware that Defendant had at no time specifically stated availability on May
10 3, 2019. Biss' action in light of these failures is consistent with Defendant's belief that Plaintiff
11 and Biss are not acting in good faith and they are intent to use the Discovery process to continue
12 to cause undue annoyance, burden, harassment or oppression to Defendant.
13

14 The court should also note that at no time after the September 6, 2018 default judgement
15 did Biss seek to move forward with a timely scheduling of the 26 f conference. This request was
16 made during the period Defendant was under time pressure to respond to Intervenor Applicant's
17 excessively lengthy and overtly vexatious Second Amended Motion to Intervene. Plaintiff and
18 Intervenor Applicant have made numerous public calls, urging Defendant to "lawyer UP!" and
19 making general threats related to this instant legal action.
20

21 Plaintiff and Intervenor Applicant, by their own admission, are both retired members of
22 the military and clandestine services with specialties in deceptive psychological and information
23 / disinformation operations. Defendant has repeated the allegation that both parties are
24 cooperating to use this instant legal action as a burdensome weapon of harassment against
25 Defendant and to chill Defendant's journalistic investigations into alleged criminal activity.
26 Plaintiff has asserted that "no evidence" exists to support Defendant's claim. It is Defendant's
27
28

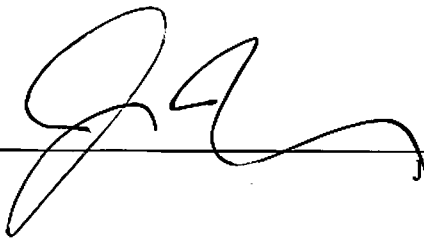
1 belief that the coordinated effort between the Plaintiff, Intervenor Applicant, Holmes and third
2 parties has been carefully crafted in a specific manner so as to circumvent standard civil legal
3 procedures and has been executed in absence of any overt, discoverable communications. Coded
4 messages sent in public via steganographic techniques, including YouTube videos and social
5 media comments and the use of third-party intermediaries, deliberately avoid leaving a
6 discoverable trail of evidence and sufficiently frustrate civil legal procedures.
7

8 It is Defendant's belief that in addition to harassing and threatening Goodman with this
9 instant legal action, it is Plaintiff's intent to further expend Defendant's resources with time
10 consuming and costly discovery that would serve no useful purpose proportional to the undue
11 burden in resolving this matter but merely waste additional time and resources for both
12 Defendant and this honorable Court.
13

14 IV. CONCLUSION

15 WHEREFORE, Defendant Goodman requests that the Court enter an order protecting
16 him from responding and/or producing documents in response to Plaintiffs' Request for
17 Discovery and to stay Discovery to protect Defendant from annoyance, embarrassment,
18 oppression, and undue burden and expense.
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Jason Goodman, Pro Se
252 7th Avenue Apt 6s
New York, NY 10001
truth@crowdsourcethetruth.org

(EXHIBIT A)

From: Steven S. Biss [REDACTED]
Subject: Steele - Goodman
Date: April 16, 2019 at 11:42 AM
To: Terry C. Frank [REDACTED] Johan Conrod [REDACTED] Jason Goodman truth@crowdsourcethetruth.org,
Jason Goodman jasongoodman72@protonmail.com, Susan A. Lutzke [REDACTED]
Cc: Robert Steele [REDACTED]



All,

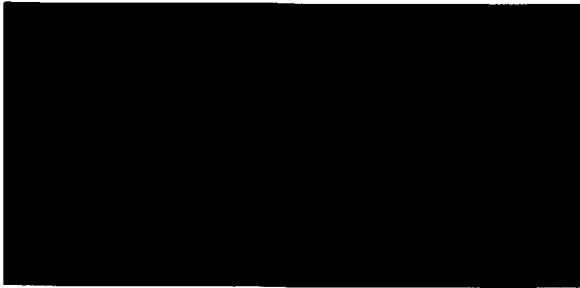
It is time to conduct the Rule 26f conference, and begin discovery.

Please email me your available dates over the next 2 weeks, so I can schedule a conference call.

Also, please confirm that a litigation hold was placed on all documents and electronically-stored information (ESI), and when that hold was instituted.

Call or email me if you have any questions.

Steven S. Biss



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This communication (including any attachments) may contain legally privileged and confidential information intended solely for the use of the intended recipient. If you are not the intended recipient, immediately stop reading this email and delete it from your system.

(EXHIBIT B)

From: Steven S. Biss [REDACTED]
Subject: Re: Steele - Goodman
Date: April 19, 2019 at 10:26 AM
To: Jason Goodman truth@crowdsourcethetruth.org
Cc: Terry C. Frank [REDACTED], Johan Conrod [REDACTED], Jason Goodman jasongoodman72@protonmail.com, Sue [REDACTED], Robert David Steele [REDACTED], Steven Biss [REDACTED]



Terry/Johan,

See Mr. Goodman's email below. Please confirm that you are available on May 2 or 3 for the Rule 26f conference.

If I do not hear from you, I plan to proceed with the discovery conference in your absence.

By copy of this email, I am asking Ms. Lutzke to supply a workable phone number, so I can include her in the conference call.

Call or email me if you have any questions.

Steven S. Biss
[REDACTED]

From: Jason Goodman
Sent: Thursday, April 18, 2019 4:03 PM
To: Steven Biss
Cc: Terry C. Frank; Johan Conrod; Jason Goodman; Sue; Robert David Steele
Subject: Re: Steele - Goodman

I will be available after May 1. Please suggest some mutually convenient dates for a call. All electronic documents I have created for more than a decade are stored. I do not deliberately delete things.

On Apr 16, 2019, at 11:42 AM, Steven S. Biss <stevenbiss@earthlink.net> wrote:

All,

It is time to conduct the Rule 26f conference, and begin discovery.

Please email me your available dates over the next 2 weeks, so I can schedule a conference call.

Also, please confirm that a litigation hold was placed on all documents and electronically-stored information (ESI), and when that hold was instituted.

Call or email me if you have any questions.

Steven S. Biss
[REDACTED]



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(EXHIBIT C)

From: Jason Goodman truth@crowdsourcethetruth.org

Subject: Re: Steele - Goodman

Date: May 2, 2019 at 12:48 PM

To: Steven Biss [REDACTED]

Cc: Terry C. Frank [REDACTED], Johan Conrod [REDACTED], Jason Goodman jasongoodman72@protonmail.com, Sue [REDACTED], Robert David Steele [REDACTED]



Mr. Biss,

Since our previous email on this matter over one week ago, I have received no confirmation of this conference call. I have also not seen a response to any messages in this regard from the other copied parties so I will consider the conference canceled for the time being.

I will be traveling for work and family commitments over the next several weeks and will be generally unavailable.

Please suggest some dates during the first week of June so that all concerned will have ample warning to arrive at a mutually agreeable time to confer.

Jason

On Apr 19, 2019, at 11:05 AM, Steven S. Biss <stevenbiss@earthlink.net> wrote:

Mr. Goodman,

We are not going to engage you. After the Rule 26f conference, you will be free to serve whatever discovery you deem appropriate consistent with Rule 26.

Steven S. Biss
[REDACTED]

From: Jason Goodman

Sent: Friday, April 19, 2019 10:50 AM

To: Steven Biss

Cc: Terry C. Frank; Johan Conrod; Jason Goodman; Sue; Robert David Steele

Subject: Re: Steele - Goodman

Please advise your client to preserve all communications with US Congressman Devin Nunes

On Apr 19, 2019, at 10:26 AM, Steven S. Biss <[REDACTED]> wrote:

Terry/Johan,

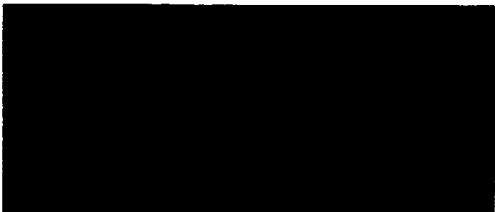
See Mr. Goodman's email below. Please confirm that you are available on May 2 or 3 for the Rule 26f conference.

If I do not hear from you, I plan to proceed with the discovery conference in your absence.

By copy of this email, I am asking Ms. Lutzke to supply a workable phone number, so I can include her in the conference call.

Call or email me if you have any questions.

Steven S. Biss
(Virginia State Bar # 32972)



From: Jason Goodman
Sent: Thursday, April 18, 2019 4:03 PM
To: Steven Biss
Cc: Terry C. Frank; Johan Conrod; Jason Goodman; Sue; Robert David Steele
Subject: Re: Steele - Goodman

I will be available after May 1. Please suggest some mutually convenient dates for a call. All electronic documents I have created for more than a decade are stored. I do not deliberately delete things.

On Apr 16, 2019, at 11:42 AM, Steven S. Biss <[REDACTED]> wrote:

All,


It is time to conduct the Rule 26f conference, and begin discovery.

Please email me your available dates over the next 2 weeks, so I can schedule a conference call.

Also, please confirm that a litigation hold was placed on all documents and electronically-stored information (ESI), and when that hold was instituted.

Call or email me if you have any questions.

Steven S. Biss



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||| not the intended recipient, immediately stop reading this email and delete it from your system.

(EXHIBIT D)

From: Steven S. Biss [REDACTED]
Subject: Re: Steele - Goodman
Date: May 2, 2019 at 1:56 PM
To: Jason Goodman truth@crowdsourcethetruth.org
Cc: Jason Goodman jasongoodman72@protonmail.com, Terry C. Frank [REDACTED] Johan Conrod [REDACTED]
Sue [REDACTED], Robert David Steele [REDACTED]



Mr. Goodman,

Susan Lutzke first provided the ProtonMail email address to us on November 6, 2017. See email chain attached.

Until today, you have never indicated that the ProtonMail email address was defunct or inaccessible. Indeed, you copied the ProtonMail email address on virtually every email you have sent over the past year+.

I will call your number in the am at the scheduled time. Have a good day.

From: Jason Goodman
Sent: Thursday, May 02, 2019 1:28 PM
To: Steven S. Biss
Cc: Jason Goodman ; Terry C. Frank ; Johan Conrod ; Sue ; Robert David Steele
Subject: Re: Steele - Goodman

This was sent only to a defunct and inaccessible email address provided by D. George Sweigert. I never provided a ProtonMail email address to you and have never contacted you from that address. Based on your prior conduct I suspect you did this deliberately so I would miss the conference and you would then report that to the court as failure to cooperate. I did not receive this confirmation and I am no longer available tomorrow. Please select a date sometime during the first week of June and stop playing games.

Jason Goodman
323-744-7594

On May 2, 2019, at 1:19 PM, Steven S. Biss <stevenbiss@earthlink.net> wrote:

Mr. Goodman,

Attached is the confirmation that you received the day after you provided your available dates.

I am not going to argue with you.

From: Jason Goodman
Sent: Thursday, May 02, 2019 1:11 PM
To: Steven S. Biss
Cc: Jason Goodman ; Terry C. Frank ; Johan Conrod ; Sue ; Robert David Steele
Subject: Re: Steele - Goodman

I received no confirmation and will not be available. Please indicate a date first week of June so we may have ample time to arrive at a mutually agreeable time.

Jason Goodman
[REDACTED]

On May 2, 2019, at 1:06 PM, Steven S. Biss <stevenbiss@earthlink.net> wrote:

Mr. Goodman,

The conference was duly scheduled and confirmed. It will take place tomorrow as scheduled.

I will dial your number at 10:00 a.m. If you choose not to pick up, we will proceed with the conference in your absence.

During the conference, we will be discussing the matters in Rule 26f2-3 of the Federal Rules of Civil Procedure. Rule 26f2-3 state as follows:

(2) *Conference Content; Parties' Responsibilities.* In conferring, the parties must consider the nature and basis of their claims and defenses and the possibilities for promptly settling or resolving the case; make or arrange for the disclosures required by Rule 26(a)(1); discuss any issues about preserving discoverable information; and develop a proposed discovery plan. The attorneys of record and all unrepresented parties that have appeared in the case are jointly responsible for arranging the conference, for attempting in good faith to agree on the proposed discovery plan, and for submitting to the court within 14 days after the conference a written report outlining the plan. The court may order the parties or attorneys to attend the conference in person.

(3) *Discovery Plan.* A discovery plan must state the parties' views and proposals on:

(A) what changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement of when initial disclosures were made or will be made;

(B) the subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues;

(C) any issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced;

(D) any issues about claims of privilege or of protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order under Federal Rule of Evidence 502;

(E) what changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed; and

(F) any other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c).

I welcome your participation and input on the above subjects.

From: Jason Goodman
Sent: Thursday, May 02, 2019 12:48 PM
To: Steven Biss
Cc: Terry C. Frank ; Johan Conrod ; Jason Goodman ; Sue ; Robert David Steele
Subject: Re: Steele - Goodman

Mr. Biss,

Since our previous email on this matter over one week ago, I have received no confirmation of this conference call. I have also not seen a response to any messages in this regard from the other copied parties so I will consider the conference canceled for the time being.

I will be traveling for work and family commitments over the next several weeks and will be generally unavailable.

Please suggest some dates during the first week of June so that all concerned will have ample warning to arrive at a mutually agreeable time to confer.

Jason

On Apr 19, 2019, at 11:05 AM, Steven S. Biss <stevenbiss@earthlink.net> wrote:

Mr. Goodman,
We are not going to engage you. After the Rule 26f conference, you will be free to serve whatever discovery you deem appropriate consistent with Rule 26.
Steven S. Biss



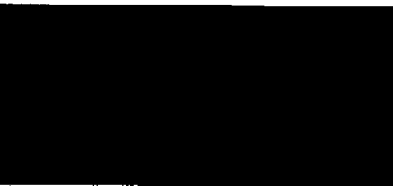
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Cc: Terry C. Frank; Johan Conrod; Jason Goodman; Sue; Robert David Steele
Subject: Re: Steele - Goodman

Please advise your client to preserve all communications with US Congressman Devin Nunes

On Apr 19, 2019, at 10:26 AM, Steven S. Biss <stevenbiss@earthlink.net> wrote:

Terry/Johan,
See Mr. Goodman's email below. Please confirm that you are available on May 2 or 3 for the Rule 26f conference.
If I do not hear from you, I plan to proceed with the discovery conference in your absence.
By copy of this email, I am asking Ms. Lutzke to supply a workable phone number, so I can include her in the conference call.

Call or email me if you have any questions.
Steven S. Biss



From: Jason Goodman
Sent: Thursday, April 18, 2019 4:03 PM
To: Steven Biss
Cc: Terry C. Frank; Johan Conrod; Jason Goodman; Sue; Robert David Steele

Subject: Re: Steele - Goodman

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All,

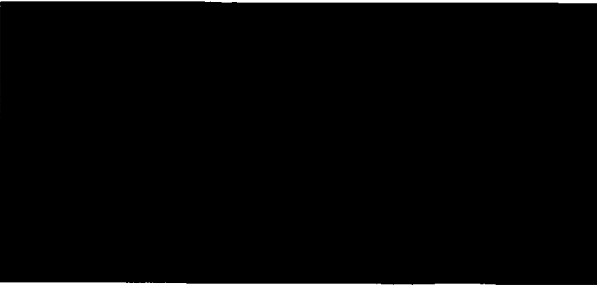
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Also, please confirm that a litigation hold was placed on all documents and electronically-stored information (ESI), and when that hold was instituted.

Call or email me if you have any questions.

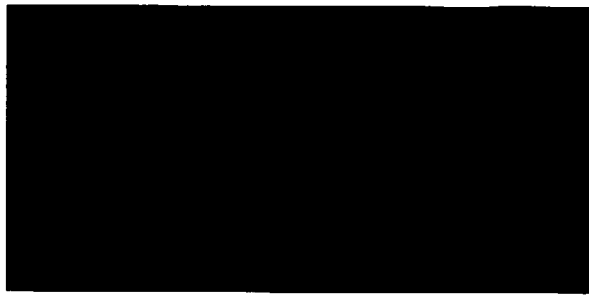
Steven S. Biss



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Steven S. Biss



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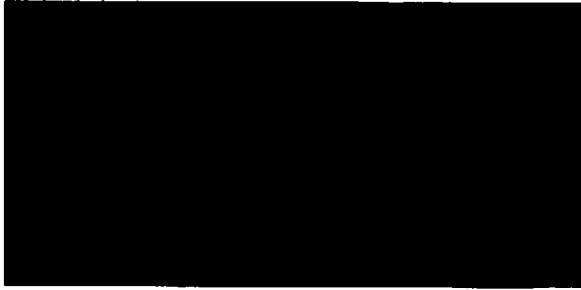
Steven S. Biss



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11.7.17 -
Lutzke.eml

(EXHIBIT E)

Mr. Goodman, please confirm the correct number to reach you at on 5/3.

https://urldefense.proofpoint.com/v2/url?u=http-3A__www.linkedin.com_in_steven-2Ds-
Di_7U6GmDDA&r=JOAHRbenIrw8HCxFq6F255jqKehbeZKL9pQ0IkCWvc&m=WijuhXx
B_s&s=gr4FKWGTnzLpJLGz7qD1YXIOLdG2nchClkS5J9tstycb&e=>

From: Wills, Benjamin A.
Sent: Friday, April 19, 2019 11:22 AM
To: Steven S. Biss
Cc: jasongoodman72@protonmail.com; Frank, Terry C.; Conrod, R. Johan
Subject: RE: Steele - Goodman

Steven,

Good morning. I have availability to participate on behalf of Ms. Negron on 5/2 after midday or anytime on 5/3. Please let me know what time you propose for the call.

Thank you,

www.kaufCAN.com<<http://www.kaufCAN.com>>

Celebrating a Century, One Charity at a Time.
Click here<<https://www.kaufcan.com/>> to learn more.

From: Steven S. Biss [REDACTED]
Sent: Friday, April 19, 2019 10:27 AM
To: Jason Goodman <truth@crowdsourcethetruth.org<<mailto:truth@crowdsourcethetruth.org>>>
Cc: Frank, Terry C. [REDACTED]; Conrad, R. Johan
[REDACTED] Jason Goodman
<jasongoodman72@protonmail.com<<mailto:jasongoodman72@protonmail.com>>>; Sue
[REDACTED] Robert David Steele
[REDACTED]; Steven Biss
[REDACTED]
Subject: Re: Steele - Goodman

Terry/Johan,

See Mr. Goodman's email below. Please confirm that you are available on May 2 or 3 for the Rule 26f conference.

If I do not hear from you, I plan to proceed with the discovery conference in your absence.

By copy of this email, I am asking Ms. Lutzke to supply a workable phone number, so I can include her in the conference call.

Call or email me if you have any questions.

Steven S. Biss
[REDACTED]
[REDACTED]
[REDACTED]ph>
[www.linkedin.com/in/steven-s-biss-6517037<https://urldefense.proofpoint.com/v2/url?u=http-3A__www.linkedin.com_in_steven-2Ds-2Dbiss-2D6517037&d=DwQFaQ&c=QKHPbakIsHoCi_7U6GmDDA&r=YolcUPneebcN1XZjGf_9O6HMT-rAiubcs5ayE2MV4sQ&m=TC5WxG3dZ6YnOQm9zRFNi3Y-lauV6TmVhS0Gn0Pac9I&s=neVLm-rED15J6Hlb_oiOMGiu3GAlimFF5to1zC6aOKk&e=>](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.linkedin.com_in_steven-2Ds-2Dbiss-2D6517037&d=DwQFaQ&c=QKHPbakIsHoCi_7U6GmDDA&r=YolcUPneebcN1XZjGf_9O6HMT-rAiubcs5ayE2MV4sQ&m=TC5WxG3dZ6YnOQm9zRFNi3Y-lauV6TmVhS0Gn0Pac9I&s=neVLm-rED15J6Hlb_oiOMGiu3GAlimFF5to1zC6aOKk&e=>)

From: Jason Goodman
Sent: Thursday, April 18, 2019 4:03 PM
To: Steven Biss
Cc: Terry C. Frank; Johan Conrad; Jason Goodman; Sue; Robert David Steele
Subject: Re: Steele - Goodman

I will be available after May 1. Please suggest some mutually convenient dates for a call. All electronic documents I have created for more than a decade are stored. I do not deliberately delete things.

On Apr 16, 2019, at 11:42 AM, Steven S. Biss <stevenbiss@earthlink.net<<mailto:stevenbiss@earthlink.net>>> wrote:

All,

It is time to conduct the Rule 26f conference, and begin discovery.

Please email me your available dates over the next 2 weeks, so I can schedule a conference call.

Also, please confirm that a litigation hold was placed on all documents and electronically-stored information (ESI), and when that hold was instituted.

Call or email me if you have any questions.

Steven S. Biss



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1 IN THE UNITED STATES DISTRICT COURT

2
3 FOR THE EASTERN DISTRICT OF VIRGINIA

4 RICHMOND DIVISION

5 ROBERT DAVID STEELE, et al.,

Case No.: 3:17-cv-00601-MHL

6 Plaintiff,

7 vs.

CERTIFICATE OF SERVICE

8 JASON GOODMAN, et al.,

9 Defendant

10
11 **CERTIFICATE OF SERVICE**

12 It is hereby certified that the accompanying materials have been placed in the U.S. Postal
13 Service with First Class mail postage affixed and addressed to the following parties:

14 Clerk of the Court

15 U.S. District Court 701 E. Broad St.

16 Richmond, VA 23219

17
18 Steven S. Biss

19 300 West Main Street, Suite 102

20 Charlottesville VA 22903

21
22 Terry C Frank

23 1021 E. Cary Street, 14th Floor

24 Richmond VA 23219

25
26
27
28 CERTIFICATE OF SERVICE - 1

1
2 D. George Sweigert

3 PO Box 152

4
5 Mesa, AZ 85211

6
7 Susan Homes,

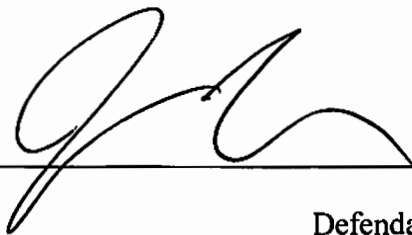
8 2608 Leisure Drive Apt.B

9 Fort Collins, CO 80525
10

11
12 I hereby attest that the foregoing is true and accurate under the penalties of perjury.

13
14 Signed this 6 day of May 2019

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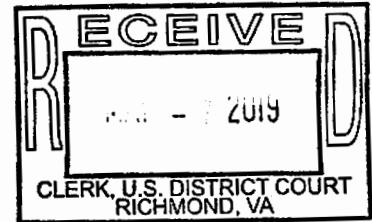
Defendant, Pro Se Jason Goodman

252 7th Avenue Apt 6s

New York, NY 10001

truth@crowdsourcethetruth.org

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond DIVISION



ROBERT DAVID STEELE, et al.,

Plaintiff(s),

v.

Civil Action Number: 3:17-cv-00601-MHL

JASON GOOMDAN

Defendant(s).

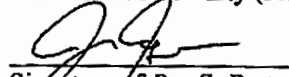
LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of DEFENDANT'S MOTION FOR PROTECTIVE ORDER AND MOTION TO STAY DISCOVERY
(Title of Document)

Jason Goodman

Name of *Pro Se* Party (Print or Type)


Signature of *Pro Se* Party

Executed on: May 6, 2019 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____
(Title of Document)

Signature of *Pro Se* Party

Executed on: _____ (Date)